Russo & Gould LLP

ATTORNEYS AT LAW

33 Whitehall Street, New York, New York 10004 Phone (212) 482-0001; Fax (212) 482-0002 www.russogould.com

MEMO ENDORSED

Partner Kevin G. Horbatiuk, Esq. khorbatiuk@russogould.com (212) 482-0001 x134

January 12, 2024

Hon. Judge Edgardo Ramos United States District Judge United States District Court – Southern District of New York 40 Foley Square New York, NY 10007

Re: Rachel Isaac-Menard v. New York Life Group Insurance Company of NY

Docket Number: 1:23-cv-02359 R&G File Number: 817.024

Honorable Judge Edgardo Ramos,

I represent the defendant New York Life Group Insurance Company of NY ("NYLGICNY") in the above-referenced action. I am submitting this letter in support of my application, with consent of plaintiff's counsel, to adjourn the Case Management Conference. I respectfully request that the adjournment take place after February 21, 2024. The original date of the Case Management Conference was January 16, 2024. No prior request has been made to adjourn the conference. The extension is necessary so that we can continue our efforts at attempting to resolve this matter by participating in a virtual mediation currently scheduled for February 21, 2024.

Respectfully submitted,

/s/ Nevin 4. Horbana

Kevin G. Horbatiuk, Esq.

CC: Dell & Schaefer, Chartered Gregory Michael Dell, Esq. Attorneys for Plaintiff 2625 Weston Road, Weston FL 33331

Telephone: (954) 620-8300 Fax: (954) 922-6864

Email: gdell@diattorney.com

The January 16, 2024 case management conference is adjourned to February 29, 2024, at 11 a.m. by telephone. The parties are instructed to call (877) 411-9748 and enter access code 3029857# when prompted.

SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 1/12/2024 New York, New York